

FILED

2017 APR 26 AM 11:08

CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANTHONY HAYNES, and  
CORDELL JENKINS

Defendants.

) INDICTMENT

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JUDGE ZOUHARY

CASE NO 3:17 CR 158

Title 18, Section 1591(a)(1),  
(b)(2), (c) and (d), United States  
Code

Title 18, Section 2251(a) and (e),  
United States Code

Title 18, Section 2252(a)(2),  
United States Code

Title 18, Section 2, United States  
Code

COUNT 1

**Sexual Exploitation of Children  
18 U.S.C. § 2251(a) and (e)**

The Grand Jury charges:

Beginning in or about June 2014, and continuing until in or about March 2017, in the Northern District of Ohio, Western Division, the defendant, ANTHONY HAYNES, did knowingly employ, use, persuade, induce, entice, and coerce a minor, that is JUVENILE #1, to engage in any sexually explicit conduct for the purpose of producing a visual depiction of that conduct, knowing and having reason to know that the visual depiction would be transported or

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transmitted using any means or facility of interstate or foreign commerce, and that the visual depiction would be produced or transmitted using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, in violation of Title 18, United States Code, Sections 2251(a) and (e).

**COUNT 2**  
**Sexual Exploitation of Children**  
**18 U.S.C. § 2251(a) and (e)**

The Grand Jury further charges:

Beginning in or about January 2017, and continuing until in or about March 2017, in the Northern District of Ohio, Western Division, the defendant, CORDELL JENKINS, did knowingly employ, use, persuade, induce, entice, and coerce a minor, that is JUVENILE #1, to engage in any sexually explicit conduct for the purpose of producing a visual depiction of that conduct, knowing and having reason to know that the visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce, and that the visual depiction would be produced or transmitted using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, in violation of Title 18, United States Code, Sections 2251(a) and (e).

**COUNT 3**  
**Sex Trafficking of Children**  
**18 U.S.C. § 1591(a)(1), (b)(2), and (c)**

The Grand Jury further charges:

Beginning in or about June 2014, and continuing until in or about March 2017, in the Northern District of Ohio, Western Division, the defendant, ANTHONY HAYNES, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means, a person, that is, JUVENILE #1, in and affecting interstate and foreign commerce, knowing, and in

reckless disregard of the fact, JUVENILE #1 had not obtained the age of 18 years, and having had a reasonable opportunity to observe JUVENILE #1, and would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c).

**COUNT 4**  
**Sex Trafficking of Children; Aiding and Abetting**  
**18 U.S.C. § 1591(a)(1), (b)(2), and (c); and 18 U.S.C. § 2**

The Grand Jury further charges:

Beginning in or about December 2016, and continuing until in or about March 2017, in the Northern District of Ohio, Western Division, the defendants, ANTHONY HAYNES and CORDELL JENKINS, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means, a person, that is, JUVENILE #1, in and affecting interstate and foreign commerce, knowing, and in reckless disregard of the fact, JUVENILE #1 had not obtained the age of 18 years, and having had a reasonable opportunity to observe JUVENILE #1, and would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c); and Title 18, United States Code, Section 2.

**COUNT 5**  
**Sex Trafficking of Children**  
**18 U.S.C. § 1591(a)(1), (b)(2), and (c)**

The Grand Jury further charges:

In or about March 2017, in the Northern District of Ohio, Western Division, the defendant, CORDELL JENKINS did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means, a person, that is, JUVENILE #2, in and affecting interstate and foreign commerce, knowing, and in reckless disregard of the fact, JUVENILE #2 had not obtained the age of 18 years, and having had a reasonable opportunity to observe JUVENILE #2,

and would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c).

**COUNT 6**  
**Certain Activities Relating to Material Involving the Sexual Exploitation of Minors**  
**18 U.S.C. § 2252(a)(2)**

The Grand Jury further charges:

Beginning in or about January 2017, and continuing until in or about March 2017, in the Northern District of Ohio, Western Division, the defendant, CORDELL JENKINS, did knowingly receive visual depictions using any means or facility of interstate or foreign commerce, that is, a cellular telephone, the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct, and the visual depictions were of such conduct, in violation of Title 18, United States Code, Section 2252(a)(2).

**COUNT 7**  
**Obstruction of Sex Trafficking Investigation**  
**18 U.S.C. § 1591(d)**

The Grand Jury further charges:

Beginning on or about March 29, 2017, and continuing until on about April 7, 2017, in the Northern District of Ohio, Western Division, the defendant, ANTHONY HAYNES, obstructed, attempted to obstruct, and interfered with the enforcement of Title 18, United States Code, Section 1591, as charged in Counts 3, 4, and 5 of this Indictment, in violation of Title 18, United States Code, Section 1591(d).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.